



**DEPARTMENT OF THE NAVY**  
COMMANDER NAVY REGION SOUTHWEST  
937 NO. HARBOR DR.  
SAN DIEGO, CA 92132-0050

IN REPLY REFER TO:  
3 May 99

Ms. Jacqueline Schafer, Director  
Arizona Department of Environmental Quality  
3033 North Central Avenue  
Phoenix, AZ 85012

Dear Ms. Schafer:

I am writing as the Department of Defense Regional Environmental Coordinator on behalf of the military services in the state of Arizona. Over the past 12-15 months the military installations in Arizona have been in a dialogue with the Permits Section of the Air Quality Division with respect to regulatory requirements for air emissions from Military Tactical Support Equipment (TSE). This equipment is vital to DoD's national security mission. It is this equipment that powers radar, communications and other gear during deployed missions. This equipment is also used to start military aircraft. The nature of this equipment requires that it be moved around the world to accompany forward deployed units. This constant movement creates tremendous administrative hurdles for recordkeeping requirements of individual engines.

The Permit Section issued an Interoffice Memorandum on December 9, 1998, followed by a January 8, 1999 clarification phone call to Marine Corps Air Station Yuma contractors, and another letter to the Air Force, dated February 22, 1999, with their interpretation of the applicable regulations. We have reached agreement on a number of the issues surrounding TSE. However, several significant issues remain, and we have chosen to elevate these to your attention for further review and consideration.

Specifically, DoD and the Permit Section disagree on whether TSE powered by turbine engines meet the definition of a nonroad engine and whether TSE is exempt from regulation as a stationary source pursuant to either Title V of the Clean Air Act or the Article 7 stationary source provisions of the Arizona air program. According to DoD, all TSE are nonroad engines, a subcategory of mobile sources. Attached to this letter is an addendum with background information and the technical and legal underpinnings for our position.

Thank you for your prompt reconsideration of this very important issue to DoD. We would like to extend an invitation to you, and renew our invitation to your staff, to visit one of the Arizona military installations that use TSE, and see first hand the types of TSE we have in our inventory and how this equipment is used in support of our national defense mission. If you are interested in a site visit, or have further questions regarding this analysis, I have listed several service points of contact at the end of the attached addendum.

*W. Z. Froman*  
W. Z. FROMAN